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June 24, 2025

**BY ECF AND HAND DELIVERY**

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Stein et al. v. Skatteforvaltningen, No. 23-cv-02508 (NRB)

Dear Judge Buchwald:

We write on behalf of defendant/counterclaim-plaintiff Skatteforvaltningen (“SKAT”) concerning the electronically filed version of DX-520 (ECF No. 240-8), the April 2021 Danish indictment of Stein, Lhote and McGee, among others, that SKAT filed on June 20, 2025, pursuant to the Court’s previous order.

The indictment identifies certain pension plans from which the Danish prosecution requests confiscation. Stein and Lhote previously argued that the identities of the parties to the settlement agreement, aside from Stein, Lhote, and McGee, including the Covered Party pension plans, should be sealed. (*See generally* ECF No. 27.) And the parties moved to seal the identities of the parties to the settlement agreement, aside from Stein, Lhote, and McGee, in their pre-trial submissions. (*See* ECF Nos. 158, 162.) The indictment does not mention, let alone identify any party to, the settlement agreement. Nonetheless, Stein, Lhote and McGee request that SKAT replace the filed version of the indictment with a version with the names of the pension plans identified therein redacted. Stein, Lhote and McGee also request that the addresses of the indicted individuals listed therein be redacted.

As such, in accordance with Rule 21.7 of the Court’s Electronic Case Filing Rules and Instructions, SKAT contacted the Court’s ECF Help Desk, which placed DX-520 temporarily under seal. And SKAT respectfully requests that the Court formally seal ECF No. 240-8. Enclosed herewith is a redacted version of DX-520 to replace ECF No. 240-8.

Respectfully submitted,

/s/ Marc A. Weinstein

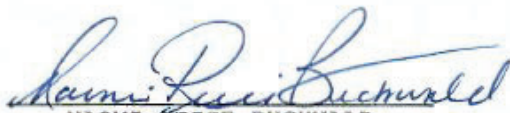
Marc A. Weinstein

Enclosure

Cc: All counsel of record (by ECF)

Application granted.

**SO ORDERED.**



NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Date: June 25, 2025  
New York, New York